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September 29, 2023

VIA ECF

The Honorable J. Brendan Day, U.S.M.J.
U.S. District Court for the District of New Jersey
Clarkson S. Fisher Building
& U.S. Courthouse
402 East State Street
Trenton, New Jersey 08608

**Re: Association of New Jersey Rifle & Pistol Clubs, Inc. ("ANJRPC") v. Platkin, -
3:18-cv-10507-PGS-JBD
Cheeseman v. Platkin - 1:22-cv-04360-PGS-JBD
Ellman v. Platkin - 3:22-cv-04397-PGS-JBD
(Consolidated)**

Dear Judge Day:

We represent the *ANJRPC* and *Ellman* Plaintiffs in the above referenced consolidated matters.

By order dated September 6, 2023 (ECF No. 167), the Court adopted the parties' proposed scheduling order for summary judgment and *Daubert* motions. Included in the schedule was a provision allowing a party to request extended brief page length, seven days prior to filing, after meeting and conferring with all parties.

Accordingly, *ANJRPC* and *Ellman* Plaintiffs hereby request leave to file 60 page initial moving briefs instead of the usual 40 pages allowed by L. Civ. R. 7.2. **All parties have consented to this request.**

The Honorable J. Brendan Day, U.S.M.J.

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We make this request for two reasons. First, *ANJRPC* and *Ellman* Plaintiffs are jointly filing a single brief covering both the *ANJRPC* and *Ellman* cases. Therefore, a single summary judgment brief is addressing two cases and two sets of claims. Second, as to *Daubert* motions, Defendants have offered *nine* experts. That unusually large number of experts requires a larger than usual moving brief.

While these Plaintiffs will endeavor to bring these briefs in under 60 pages, we request leave to file up to 60 page moving brief in the upcoming motions.

Thank you.

Respectfully submitted,

s/ Daniel L. Schmutter
DANIEL L. SCHMUTTER

DLS/lms

cc: All counsel via ECF